

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

FIRST-CLASS MAIL AND PERIODICALS
SERVICE STANDARD CHANGES, 2021

Docket No. N2021-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE WITNESS ROBERT
CINTRON TO THE NATIONAL NEWSPAPER ASSOCIATION'S INTERROGATORIES
NNA/USPS-T4-1, 2, AND 4, REDIRECTED FROM WITNESS MONTEITH
(NNA/USPS-T4-1, 2, AND 4)
(May 26, 2021)**

The United States Postal Service hereby provides its responses to the National Newspaper Association's Interrogatories NNA/USPS-T4-1, 2, and 4 to United States Postal Service Witness Monteith, redirected to Witness Cintron, issued on May 19, 2021.¹ Each question is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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¹ The Postal Service believes that NNA has exceeded the limit on interrogatories set forth in Rule 3020.117(a), pursuant to federal case law adopted by the Commission. Order No. 2080, Order Adopting Amended Rules of Procedure for Nature of Service Proceedings under 39 U.S.C. 3661 (May 20, 2014), at 44. Nevertheless, the Postal Service has chosen to respond to these interrogatories in lieu of filing a motion to be excused from doing so on numerosity grounds. The Postal Service's choice to accommodate NNA in this specific instance should not be construed as a waiver of the Postal Service's right to seek excusal from any further interrogatories by NNA on numerosity or other grounds, or from any arguably excessive interrogatories by any other party in any other instance.

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May 26, 2021

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FROM WITNESS MONTEITH**

NNA/USPS-T4-1: Please refer to your testimony on p. 19 where you state: "As previously noted, we will set our service performance targets to 95 percent once the new service standards are established, and we expect to meet or exceed those standards on a consistent basis. Consistent service performance will likely better align customers' expectations with actual delivery performance. As a result, these proposed changes may improve customer satisfaction and minimize any financial impact resulting from the changes by increasing the Postal Service's ability to consistently deliver mail within the customers' expectations."

- a. Please explain why USPS sets service performance targets.
- b. Why does USPS set its targets at 95 percent as opposed to any other number?
- c. Does the Postal Service believe the service targets are the functional equivalent of lowering the service standards and if not, why not?
- d. If the Postal Service believes current standards are unachievable, why does it not simply lower the targets rather than changing the standards?
- e. Does the Postal Service have any studies or surveys that indicate a public understanding that service performance targets are not 100% of the standards?

RESPONSE:

- a. The Postal Service sets service performance targets as a mechanism to drive organizational performance towards meeting the established service standards.
- b. 95% was determined to be an appropriate standard for defining "service excellence" across all categories of products. Regarding First-Class Mail, the target is consistent with observed service performance of First-Class Mail products when considering volume delivered within one or two days after the service standard.
- c. No, the Postal Service recognizes service standards and service targets are different. Service standards are the expectation communicated to the public and service performance targets are set to drive performance towards meeting the customer expectation. Performing poorly against the customer expectations will drive dissatisfaction and the goal of this adjustment is to realign the standards and drive performance against those new standards.

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d. Please refer to the response to subpart (c), above. Communicating service standards that the Postal Service cannot achieve at a satisfactory level of performance will set expectations to customers that the organization cannot deliver.

e. No.

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NNA/USPS-T4-2:

- a. Please confirm that the linked page on the USPS website is available for the general public to use to look up service standards and/or seek information on what to do about late-delivered mail. If you do not confirm, explain why not.
https://faq.usps.com/s/article/Delayed-Mail-and-Packages#check_mail_delivery_standards
- b. Please confirm that the service standards listed on this page do not incorporate any reference to service performance targets.
- c. Please confirm that the list of service standards listed on this webpage does not provide an expected service standard for newspapers or magazines. If you confirm, please explain why other mail products are listed but not Periodicals.
- d. Please confirm that the only reference on this page to newspapers or magazines directs the viewer to contact the publisher in the event of service delays, but provides no way to contact the Postal Service about these specific products.
- e. Please confirm that the directory linked to the question "Who do I notify if my mail is late?" provides only physical locations to local post offices and neither telephone numbers nor email addresses for mail recipients to use.

RESPONSE:

- a. Confirmed.
- b. Confirmed. Service performance targets are available elsewhere on the usps.com website.
- c. Confirmed.
- d. Confirmed in part. The website directs magazine / periodical customers to contact the publisher of the magazine in the event of a delay. The website also provides a way to contact a USPS customer representative.
- e. Not confirmed. Clicking on the link of the desired Post Office provides the address, phone number, and hours of the office.

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NNA/USPS-T4-4: Does the Postal Service intend to deliver end-to-end newspapers with 5-7 days 95% of the time if the new standards are adopted? Please explain your response.

RESPONSE:

No. No change is currently proposed to the processing and transport of the end-to-end Periodicals with a service standard of 5-7 days traversing the NDC network.